

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FILED

NOV 17 2010

WILLIAM B. GUTHRIE
Clerk, U.S. District Court
By Deputy Clerk

PAUL HOWARD TILLEY, Plaintiff(s)
(Full Name)

Case No. CIV 10 - 431
(To be supplied by the Clerk)

v.

HEARTLAND AMERICA
8085 CENTURY BLVD., Defendant(s)
CHASKA, MN 55318

COMPLAINT

A. PARTIES

1) PAUL H. TILLEY, is a citizen of OKLAHOMA
(Plaintiff) (State)

who presently resides at 901 W. CRESTVIEW #14, OKEMAH, OK, 74859
(mailing address, if different from residence)

2) Defendant HEARTLAND AMERICA is a citizen of
(Name of first defendant)
CHASKA, MN, and is employed
(City, State)
as MAIL ORDER, CATALOGUE SALES.
(Position and title, if any)

8085 CENTURY BLVD, CHASKA, MN, 55318
3) Defendant _____ is a citizen of
(Name of second defendant)
_____, and is employed
(City, State)
as _____
(Position and title, if any)

[You may attach additional pages (8½" x 11") to furnish the above information for additional defendants.]

B. JURISDICTION

- 1) Jurisdiction is asserted pursuant to

C. NATURE OF CASE

- 1) Briefly state the background of your case. PLEASE SEE ATTACHED

D. CAUSE OF ACTION

I allege the following:

- 1: PLEASE SEE ATTACHED

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

- 2: _____

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

3. _____

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

[If necessary, you may attach additional pages (8½" x 11") to explain any allegation or to list additional supporting facts in the same format as above.]

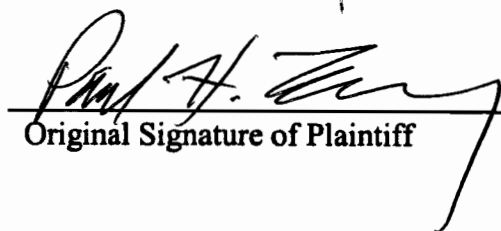
E. REQUEST FOR RELIEF

I believe that I am entitled to the following relief: \$20⁰⁰ ACTUAL DAMAGES
AND \$20,000⁰⁰ PUNITIVE DAMAGES

Current Address: 901 N. CRESTVIEW

#14, OKEMAH, OK 74459

Telephone: 918-623-0753


Original Signature of Plaintiff

PAUL H. TILLEY
901 N. CRESTVIEW #14
OKEMA, OK 74859
11-16-2010

U.S. DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA
MUSKOGEE, OKLAHOMA

YOUR HONOR;

ON OR ABOUT THE SECOND DAY OF THIS MONTH, I CALLED MY BANK TO INQUIRE ABOUT A CHARGE TO MY ACCOUNT THAT I HAD NOT MADE. THEY GAVE ME A TELEPHONE NUMBER OF THE COMPANY THAT HAD MADE THE CHARGE. I CALLED THE NUMBER. IT WAS HEARTLAND AMERICA, A COMPANY THAT I HAVE DONE BUSINESS WITH MANY TIMES. THEY SAID THAT THEY HAD WRITTEN ME A LETTER SAYING THAT THEY WOULD TAKE MONEY OUT OF MY ACCOUNT FOR SOME KIND OF CLUB FEE UNLESS I CALLED AND TOLD THEM NOT TO DO SUCH A THING.

I DO NOT REMEMBER GETTING THE LETTER, AND I THINK IT IS POOR BUSINESS PRACTICE FOR A COMPANY THAT I HAVE BOUGHT SO MUCH FROM TO DO ME THAT WAY. I HAD TO PAY A \$20.00 OVERBALANCE FEE. THEY DID DEPOSIT MY MONEY IN MY ACCOUNT, BUT I AM STILL OUT \$20.00. THIS SHOULD NOT BE ALLOWED BY ANY COMPANY, AND I WISH TO SUE FOR ACTUAL AND PUNITIVE DAMAGES SO AS TO STOP THIS KIND OF BEHAVIOR.

THANK YOU!
Paul H. Tilley

Printed for: TILLEY PAUL	Account number: 11010768 D	Description: C Club Account
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DD5400
unt

11/04/10 Page 1

Printed for: TILLEY PAUL Account number: 11010768 D Description: C Club Account

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Posted Date	Check Number	Transaction Amount	Transaction Description	Balance
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Balance

11/01/10	38.00	22	SUPP SEC FROM US TREASURY 310	SSI	192.25-
11/01/10	48.42	427	POS purchase at (1)(1)(1) +		240.67-

240.67-

11/01/10	20.00	959	OD Privilege fee	260.67
11/03/10	656.00	22	SOC SEC FROM US TREASURY 303 SSA	395.33
11/03/10	448.00			448.00

395.33

ISI*CATALOG/WEB ORDER - 800-966-1233 MN

* * * End of Report * * *

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